

PRIVACY POLICY

1. Introduction

Winley Insurance Group Pty Ltd ACN 138 133 285 respects and upholds your rights to privacy protection under the National Privacy Principles contained in the Privacy Act 1988 (Cth) (Act) and any similar state or territory legislation applicable to Winley Insurance Group Pty Ltd's operations.

This policy describes how we manage any personal information we have about you.

2. What personal information about me does Winley Insurance Group Pty Ltd hold?

The information we may collect and hold about you usually includes information such as your name, date of birth, address, telephone number, occupation, details of your involvement with Winley Insurance Group Pty Ltd and any additional personal information provided to us.

At or before the time when Winley Insurance Group Pty Ltd collects personal information, it will take reasonable steps to ensure that you are made aware of the purpose for collecting that information and how that information will be used. Where reasonable, Winley Insurance Group Pty Ltd will collect personal information directly from you and not through another party.

If you provide us with personal information of a third party, you must first take reasonable steps to ensure that the third party is aware of:

- (1) the fact that their information will be disclosed to Winley Insurance Group Pty Ltd and how to contact Winley Insurance Group Pty Ltd;
- (2) the purpose for which Winley Insurance Group Pty Ltd is collecting their personal information;
- (3) the persons or types of organisations to which Winley Insurance Group Pty Ltd usually discloses such information;
- (4) their right to gain access to the information; and
- (5) ensure that the third party has separately consented to their personal information being used and disclosed by Winley Insurance Group Pty Ltd.

3. What does Winley Insurance Group Pty Ltd do with my personal information?

We use personal information about you:

- (1) to assist in providing services to you;
- (2) to assist with any calls you make to us;
- (3) for any purpose made known to you at the time of collection of your personal information;
- (4) for our internal administrative, marketing and planning requirements; and
- (5) in connection with any applicable laws.

Occasionally, Winley Insurance Group Pty Ltd may disclose your personal information to third parties for the purposes of facilitating services that you have requested or in connection with Winley Insurance Group Pty Ltd's other security and statutory obligations. Before we disclose your personal information to third parties, we will use reasonable endeavours to satisfy ourselves that the third party will only make use of the personal information in accordance with the Act.

Winley Insurance Group Pty Ltd will not disclose personal information about you to any person except on a confidential basis to agents that we use in the ordinary operation of our business or as required by law. Winley Insurance Group Pty Ltd will only use information for the primary purpose of collection unless it reasonably believes that the use or disclosure is reasonably necessary for the prevention, detection, investigation, prosecution or punishment of criminal offences or breaches of any laws. If Winley Insurance Group Pty Ltd uses or discloses personal information in these circumstances, it will make a written note of the use or disclosure.

4. Website

Our website may collect non-personal information from your computer (i.e. the identity of your Internet browser, the type of operating system you use, your IP address and the domain name of your Internet service provider). Our website records cookies. Cookies are data that a web site transfers to an individual's hard drive for record keeping purposes. They allow us to track usage patterns and to compile data that can help us improve our content and target advertising. If you do not want information collected through the use of cookies, there is a simple procedure in most

browsers that allows you to deny or accept the cookie feature. However, if you choose to disable cookies, we will be unable to tailor our website to your individual needs.

5. How Winley Insurance Group Pty Ltd keeps your personal information secure

We take all reasonable steps to ensure that the personal information we hold is accurate, complete and up to date.

Winley Insurance Group Pty Ltd has security measures designed to protect against the loss, misuse or alteration of the information under its control. These security measures include limited access to data that we hold and electronic precautions to protect that data. Winley Insurance Group Pty Ltd reserves the right to change, modify or upgrade any of its security measures as we consider necessary.

6. Openness

You may request access to personal information we hold about you by writing to Winley Insurance Group Pty Ltd's Privacy Officer at the address below. Where we hold information that you are entitled to access, we will endeavour to provide you with a suitable range of choices as to how you access it (e.g. emailing or mailing it to you).

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request the amendment of it. We will then consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

7. Complaints

Any questions about this policy, or any complaint regarding treatment of your privacy by Winley Insurance Group Pty Ltd, should be made in writing to the address below.

Our contact details are as follows:

Winley Insurance Group Pty Ltd ACN 138 133 285

Mail: PO Box 7195, Cloisters Square, Perth, WA 6850

E-mail: privacy@winley.com.au

8. Miscellaneous

In this policy "personal information" has the same meaning as under the Act.

This policy represents our policy as of September 10, 2010 forward. We may change this policy from time to time. Although we intend to observe this policy at all times, it is not legally binding on Winley Insurance Group Pty Ltd in any way. From time to time we may regard it as necessary or desirable to act outside the policy. Winley Insurance Group Pty Ltd may do so, subject only to any other applicable contractual rights you have and any statutory rights you have under the Act or other applicable legislation. This Policy does not apply to employee records of current or former employees.